

1 Charles R. Ekberg
2 Tereza Simonyan
3 Lane Powell PC
4 1420 Fifth Avenue, Suite 4100
5 Seattle, WA 98101-2338
6 (206) 223-7000
7 (206) 223-7107 Facsimile
8 Attorneys for Bitvestment Partners
9 LLC f/k/a Dalsa Barbour LLC

The Honorable Karen A. Overstreet
Chapter 11
Hearing Date: December 30, 2013
Response Date: Date of Hearing

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re)
CLI HOLDINGS, INC. dba ALYDIAN,)
Debtor.) CASE NO. 13-19746-KAO
DECLARATION OF TEREZA
SIMONYAN IN SUPPORT OF MOTION
TO SHORTEN TIME

Tereza Simonyan declares as follows:

1. I am an attorney with the firm of Lane Powell PC, counsel for Bitvestment Partners LLC fka Dalsa Barbour LLC (“Bitvestment”). This Declaration supports Bitvestment’s *Ex Parte* Motion to Shorten Time for Hearing (the “Motion to Shorten Time”) in connection with Bitvestment’s Motion to Compel filed on December 26, 2013, pursuant to Local Bankruptcy Rule 9013-1 and Fed. R. Bankr. P. 9006(c) (“Motion to Compel”). I am competent to testify, and I make this declaration based upon my own personal knowledge.

2. On December 26, 2013, I contacted Deirdre Glynn Levin, counsel for the Debtor, and Thomas A. Buford, U.S. Trustee, in accordance with Local Rule 9013-1(d)(3)(C) of the Amended Local Bankruptcy Rules in order to give notice of Bitvestment’s intent to shorten time on the Motion to Compel.

3. If this Court grants the Motion to Shorten Time, Bitvestment will send the

DECLARATION OF TEREZA SIMONYAN IN SUPPORT OF
MOTION TO SHORTEN TIME - 1

128054.0001/5904885.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
SEATTLE, WASHINGTON 98111-9402
206.223.7000 FAX: 206.223.7107

1 Order Shortening Time and a Notice of Hearing to the following parties via email and U.S.
2 Mail, First-Class postage prepaid:

- 3 (1) Debtor's counsel;
4 (2) U.S. Trustee; and
5 (3) Special Notice Parties.

6 I declare under penalty of perjury under the laws of the State of Washington and the
7 United States that the foregoing is true and correct.

8 DATED this 26th day of December, 2013.

9
10 /s/ Tereza Simonyan
Tereza Simonyan

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
DECLARATION OF TEREZA SIMONYAN IN SUPPORT OF
MOTION TO SHORTEN TIME - 2

128054.0001/5904885.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
SEATTLE, WASHINGTON 98111-9402
206.223.7000 FAX: 206.223.7107